



BOARD OF SUPERVISORS
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Subject: Comments on the Draft Environmental Impact Report for the GSNR Forest Resiliency Demonstration Project

On behalf of the Humboldt County Board of Supervisors, we submit this comment on the Draft Environmental Impact Report (DEIR) for the Golden State Natural Resources (GSNR) Forest Resiliency Demonstration Project. Humboldt County, with its vested interest in forest health and economic development, appreciates the project's goals but emphasizes that economic progress must not compromise public health or environmental sustainability. Below, we outline concerns with the DEIR's analysis and recommendations for improvement.

Environmental Impact Concerns

1. Overstated Forest Resiliency Benefits

The DEIR emphasizes thinning and prescribed burns as key methods for wildfire mitigation. However, data presented in section 3.7 of the DEIR shows that only 27% of the forest in the project area is overstocked, with just 15% of targeted feedstock sourced from high-density stands. In contrast, over 50% of feedstock will come from commercial logging and salvage operations, aligning this project more closely with pellet production than forest health.

Further, the scale of the facilities, anticipated to be the largest in the United States, raises concerns about the sustainability of forest resources. The DEIR does not project how feedstock sources may evolve over time as forests are thinned. Without transparent planning and monitoring, the project risks depleting forest resources, undermining its environmental goals.

2. Underestimated Greenhouse Gas (GHG) Impacts

The DEIR's lifecycle analysis underreports the carbon impact of initial forest thinning and overstates the long-term carbon neutrality of pellet combustion. Thinning removes carbon storage from forests, with no guarantee of reabsorption due to climate impacts like drought or wildfires. This decrease in carbon storage is not accurately analyzed in the DEIR. Additionally, the DEIR fails to account for the increased emissions from transportation and production caused by the lower energy density of wood pellets compared to coal.

Air Quality and Environmental Justice in Stockton

1. Significant Air Quality Impacts

Port operations, including shipping, rail transport, and pellet storage, are expected to emit NOx and PM2.5 at levels exceeding regional thresholds. Mitigation measures like alternative fuels lack enforceability, creating uncertainty about actual improvements. These emissions disproportionately affect South Stockton, an environmental justice community already burdened by poor air quality.

2. Impacts on Sensitive Receptors

The DEIR fails to address how emissions and increased traffic will affect nearby Louis Park in Stockton, which is a significant recreational and community hub. Additionally, risks like wood pellet storage fires and potential asbestos exposure during road construction are insufficiently analyzed. The cumulative air quality and health impacts must be more thoroughly assessed.

Alternatives and Controversies

1. Limited Alternatives Analysis

The DEIR does not adequately evaluate alternatives that could reduce environmental and community impacts. For example, downsizing the project by eliminating overseas shipping or developing smaller biomass plants for local energy needs could reduce emissions and resource strain.

2. Collaboration with Drax

Key controversies not fully addressed include the involvement of Drax, a company with a history of environmental violations, and the export of pellets to countries with unclear environmental benefits. These concerns must be transparently disclosed in the DEIR to ensure informed decision-making.

Recommendations

1. **Strengthen Environmental Analysis:** Accurately account for forest feedstock sustainability and GHG lifecycle impacts, including initial carbon losses.
2. **Improve Mitigation Measures:** Ensure enforceable air quality controls and localized health monitoring for Stockton residents.
3. **Expand Alternatives:** Evaluate additional project alternatives including smaller-scale biomass production and an option that eliminates overseas shipping.
4. **Address Community Impacts:** Incorporate environmental justice principles, prioritizing the needs of overburdened communities like Stockton.

We urge GSNR to amend the DEIR to address these critical shortcomings. With revisions, the project can better align with its stated goals of wildfire resilience, forest health, and sustainability without exacerbating environmental and social disparities.

Sincerely, Supervisor Michelle Bushnell

Chair of the Humboldt County Board of Supervisors